



MetroPublic Health Dept
Nashville / Davidson County
Protecting, Improving, and Sustaining Health

From: Land, Eva [<mailto:Land.Eva@epa.gov>]
Sent: Tuesday, June 13, 2017 8:17 AM
To: Finke, John (Health); McClain, Blake (Health)
Cc: Davis, Scott; Ceron, Heather; Zuniga, Mario
Subject: Tennessee Gas Pipeline Company, LLC, Initial Title V Permit Comments

The following contains our comments on the title V permit. Please feel free to call us if you have any further questions from our discussion yesterday, or on minor stylistic changes to the permit.

Dear Mr. Finke,

We have reviewed the initial title V permit for Tennessee Gas Pipeline Company, LLC – Compressor Station 563. Tennessee Gas Pipeline Company, LLC, (the applicant) proposes to operate a natural gas compressor station in Joelton, Tennessee as part of the Broad Run Expansion Project. The permit includes two natural gas-fired turbines rated at 207.8 million British thermal units per hour (MMBtu/hr), one natural-gas fired boiler rated at 4.6 MMBtu/hr, one 1,500 kilowatt natural gas-fired emergency generator powered by a 2,175 horse power spark ignition engine, condensate storage tanks, and fugitive emissions.

Based on our review of the title V permit, we have the following comments. We provide our comments to help ensure that the proposed project meets federal Clean Air Act requirements, that the permit will provide necessary information so the statement of basis for the permit decisions is transparent and readily accessible to the public, and that the record provides adequate support for the decisions.

- 1) In Section 1.30 Stratospheric Ozone and Climate Protection, Condition (a)(i) states, “Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices pursuant to Section 82.156.” with the required practices pursuant to Section 82.156.” However, 40 CFR Part 82, Subpart F regulations also include Sections 82.155: Safe Disposal of Appliances and Section 82.157: Appliance and Leak Repair. Appliances are to be disposed in accordance with Section 82.155. Section 82.155 references Section 82.156(b), but lists an alternative to disposal procedures different from Section 82.156. Starting January 1, 2019 appliance and leak repair practices shall be in accordance with practices set in Section 82.157. Condition 1.30 (a)(i) may need to reference these alternative sections.
- 2) Condition 4.1 (d) for Source No. 001, two Solar Titan natural gas-fired compressor turbines, states the gas turbines are in low-NO_x mode during operation greater than or equal to 40 percent load and must operate in this mode during normal operation at all times. The permit should require monitoring,

recordkeeping, and reporting of the turbine load to ensure compliance with the required emission limits.

- 3) The permit has included visible emission standards for the sources in Conditions 4.1 (i), 4.2 (d), 4.3 (d), and 4.4 (e). These conditions should contain corresponding compliance requirements for monitoring, recordkeeping, and reporting. The compliance conditions may require and reference that a source use natural gas, which produces little to no visible emissions.
- 4) The emission limit in Condition 4.2 (a) for Source 002, natural gas-fired boiler, shows the carbon monoxide (CO) pound per day (Lb/Day) limit at 6.62. Based on the 0.25 Lb/hr limit shown in the table, the daily limit equates to 6.00 Lb/Day. Please clarify your calculations for the CO Lb/day limit.
- 5) The natural gas-fired emergency generator is subject to 40 CFR Part 60, Subpart JJJJ. In addition to the requirements listed in this section, the source may also be subject to recordkeeping listed in 40 CFR §60.4245 (b).

If you have any questions regarding these comments or need additional information, please contact Mario Zuniga at 404-562-8961 or Eva Land at 404-562-9103.